EPA/ESD/R08-99/033
1999

EPA Superfund
Explanation of Significant Differences:

IDAHO POLE CO.
EPA ID: MTD006232276
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BOZEMAN, MT
11/27/1998

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

November 23, 1998

MEMORANDUM

SUBJECT: Explanation of Significant Differences for the Idaho Pole Company Superfund Site

FROM: Jim Harris, 8MO
Remedial Project Manager

TO: Max H. Dodson, ARA
Office of Ecosystems Protection and Remediation

Attached is an Explanation of Significant Differences (ESD) for the Idaho Pole Company Superfund Site located in Bozeman, Montana for your signature. The purpose of the ESD is to modify the scope of the site cleanup to include areas that were excluded in the 1992 Record of Decision (ROD).

The 1992 ROD excluded excavation of contaminated soils associated with structures on the site so that the company could continue operations. Idaho Pole Company announced the closing of the facility last fall and EPA believes that the remaining contaminated soils identified during the Remedial Investigation must be remediated. Access to the contaminated soils will require the demolition of several structures on the site including buildings, tanks, vaults, slabs and associated utilities.

Concurrence List: B. Fox, 8MO
J. Wardell, 8MO
S. Bohan, 8ENF-L
C. Rushin, 8ENF
M. Risner, 8ENF-L

Attachments:

EXPLANATION OF SIGNIFICANT DIFFERENCES

Idaho Pole Company Superfund Site
Bozeman, Montana

United States Environmental Protection Agency
November 1998

I. INTRODUCTION

This Explanation of Significant Differences (ESD) for the Idaho Pole Company Superfund Site (Site) is being issued by the U.S. Environmental Protection Agency (EPA) in consultation with the Montana Department of Environmental Quality (MDEQ) to explain modifications to the remedy at the Site contained in the Record of Decision (ROD) issued on September 28, 1992. Specifically, the purpose of this ESD is to document changes to the ROD for the Site which are necessitated by the closure of the Idaho Pole Company plant. This is the second ESD issued at the Site by EPA. The first ESD was issued on May 15, 1996.

In accordance with Sections 117(c) and 121 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund), as amended, 42 U.S.C. Section 9601, et seq. (CERCLA), and the regulations at 40 C.F.R. Section 300.435(c)(2)(I), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), this ESD has been prepared for the following reasons:

- to provide the public with an explanation of the nature of the changes to the remedy;
- to summarize the circumstances that led to the changes to the remedy; and
- to affirm that the revised remedy complies with all statutory requirements.

This document presents only a summary of the changes to the selected remedy and a synopsis of information on the Site. The Administrative Record, which contains this ESD and its supporting documentation, is available for public review at the locations indicated at the end of this report.

II. SITE HISTORY AND BACKGROUND

The Idaho Pole Company (IPC) wood treating facility began operation in 1945 using creosote to preserve wood. In 1952, the company switched to pentachlorophenol in carrier oil (similar to fuel oil) for the wood treating solution. IPC's wood treating operations ceased in 1997.

Throughout the course of wood treating operations, there were various releases of oily wood treating fluid from the plant. IPC conducted certain investigation and cleanup activities after contamination was identified, and in 1986, the facility was added to the National Priorities List of Superfund sites.

In 1989, MDEQ assumed the lead agency role through a cooperative agreement with EPA and began the remedial investigation and feasibility study (RI/FS) following the EPA approved Work Plan and EPA guidance. The RI defined the nature and extent of contamination and provided data to complete the baseline health and ecological risk assessments. The FS included the development, screening and evaluation of potential site remedies. The ROD was issued by EPA on September 28, 1992.

III. SUMMARY OF THE 1992 RECORD OF DECISION

The contaminants of concern at the Site are pentachlorophenol (PCP), polynuclear aromatic hydrocarbons (PAHs), polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans. The Record of Decision established cleanup levels for those contaminants of concern at the Site. The major components of the selected remedy, as modified by the May 1996 ESD include:

Soils Component

- Excavation and surface land biological treatment of contaminated soils from the pasture area, the area between Cedar Street and U.S. Interstate Highway 90 (1-90), the plant area and the former roundhouse area;

- Ambient temperature water flushing of soils underlying the pole plant facility and I-90 in order to recover hazardous substances;

- Construction of a land treatment unit (LTU) to treat excavated soils. The total soil depth on the LTU is less than two feet. The LTU will be operated to treat the surface soils to approximately one foot in depth and the soils will be removed when the cleanup levels for PCP and PAHs are met.

- Use of the treated soils for fill material on the plant site. If the soil contains other

contaminants that exceed the ROD levels, the soil will be isolated from ground water, will be covered at the surface to prevent direct contact and institutional controls on future land use will be required. A detailed closure plan for the LTU will be developed when soil monitoring results indicate that the cleanup levels for PCP and PAHs have been achieved. The closure plan will identify the areas to be backfilled with the treated soil and will specify the distance above the ground water that the treated soil must be placed and the depth of cover required. The plan will also identify the specific institutional controls to be implemented on the pole plant facility.

Ground Water Component

- Ground water cleanup using extraction and a granulated activated carbon (GAC) system and return of water to the ground water aquifer to enhance *in situ* biological degradation and to control potential migration of contaminants;

- Treatment of contaminated residential wells exceeding maximum contaminant levels (MCLs) or risk based concentrations of the contaminants of concern at the distribution point in addition to institutional controls preventing new access to contaminated ground water; and

- Continued residential and ground water monitoring to determine movement of contaminants and compliance with remedial action requirements.

IV. DESCRIPTION OF SIGNIFICANT DIFFERENCES TO THE REMEDY

The significant difference between the remedy described in the 1992 ROD and in this ESD is that the plant structures including concrete pads, piping, vaults, etc., preventing access to contaminated soil will be demolished and disposed of in accordance with State of Montana and EPA requirements and that contaminated soils underlying these areas will be excavated and treated like the accessible plant soils have been to date.

Idaho Pole Company discontinued active wood treating operations at the Site in 1997, and has indicated to EPA that it has no intention of restarting operations at this location. Since 1997, Idaho Pole Company has transferred some of its equipment off-site and is continuing to decommission the pole plant.

EPA's selection of the remedy for the contaminated soils at the Site was influenced, in large part, by the fact that an active wood treating operation existed on the Site, above contaminated soils. In the Feasibility Study, EPA and the State of Montana evaluated cleanup options including the destruction of the buildings and excavation of underlying soils. The fact that soils immediately surrounding and perhaps underneath many of the existing structures are

contaminated is supported by Site operational history which includes boil overs of wood treating fluids in 1981 and 1987. The known spills were associated with the retort building and the butt vat. Soil sampling during the RI adjacent to and underneath the plant structures confirmed that soil contamination is present.

When selecting the soils remedy, EPA determined that the direct and indirect costs of requiring the demolition of the active wood treating operation and excavation of underlying soils made this option impracticable. EPA understood from IPC that the closing of the facility would severely compromise IPC's financial viability, and could potentially result in IPC's bankruptcy. EPA sought a comparable remedy which would allow IPC to continue in business and continue earning money which could be dedicated to the cleanup of the facility. At the time of the ROD, IPC had no plans to close the facility, thus the plant structures were viewed as a *de facto* cap over the underlying contaminated soils which, for the foreseeable future, mitigated risks of exposure. The selected remedy called for excavation and treatment of contaminated soils that were accessible, and identified soil flushing/in situ biological treatment as the appropriate remedy to address soils beneath the plant and the nearby interstate highway (I-90). The ROD contemplated that institutional controls would be used in conjunction with this remedy to ensure its protectiveness, since soil flushing/in situ biological treatment as a stand alone alternative would possibly not achieve the 1×10^{-4} risk level. Soil flushing/in situ biological treatment was estimated to have a range of removal of contamination of from 40% to 80% - in other words, the selected remedy under the pole plant would not completely clean up all of the soil contamination.

With the closing of the pole plant, the relative certainty about the continued inaccessibility of soils underlying the plant has diminished markedly. It is unlikely that another wood treating operation would move onto the property and continue operations. A more likely scenario is that the property will be sold and ultimately used for another purpose. Some, if not all, of the buildings will be demolished under this scenario, and the underlying contamination will need to be addressed. By leaving contamination under the closed pole plant until some point in the future when new construction is planned, the cleanup is prolonged, issues involving the control of access to the property under new ownership arise, and the prospect arises that a new LTU would have to be constructed at significant cost. In light of these considerations, EPA has reevaluated the soils remedy at the Site and determined that it is more appropriate to demolish and dismantle the pole plant structures now and excavate and treat the underlying contaminated soils. Additional soil sampling, excavation and treatment would proceed in accordance with the procedures established in the selected remedy for accessible soils (Soil Alternative 4), as amended by the May 15, 1996 ESD.

There is no change in the remedy selected for soils underlying I-90; soil flushing will continue in this area.

Community members and City of Bozeman representatives requested, prior to the issuance of the ROD, that the cleanup be expedited. This change to the ROD will expedite the completion of the remedy. Buildings can be demolished and the underlying soils accessed,

sampled, and excavated as necessary in relatively short order, as compared to the continuous soil flushing process which is estimated to achieve the necessary results in a 5 to 10 year time frame.

This change will also reduce the reliance that will be placed on institutional controls such as land use restrictions. At present, there is negligible risk to on-site workers associated with soils underlying the pole plant. However, any future disturbance of the contaminated soils underlying the plant has the potential to recontaminate clean areas of the site and to create an unacceptable risk to human health and the environment. This potential threat would remain while the contamination remains beneath the structures. To provide more certainty, EPA is modifying the remedy to require the demolition of these vacant buildings and the removal of underlying soils that exceed the action levels set forth in the ROD.

V. SUMMARY OF STATE COMMENTS AND AVAILABILITY OF ADMINISTRATIVE RECORD

As stated above, MDEQ has considered site developments that serve as the basis for this determination and has provided comments to EPA on this matter. MDEQ's comments have been incorporated into this final ESD.

Documents related to this ESD are part of the Administrative Record for the Idaho Pole Company Site. The Administrative Record will also contain any written public comments that may be received regarding this ESD. The complete Administrative Record is available for public review at the following location:

U.S. EPA Montana Office
Federal Building, Room 192
301 South Park, Box 10096
Helena, Montana 59626-0096
(406) 441-1150
Mon-Fri,8:00 a.m.to 5:00 p.m.

Bozeman Public Library
220 East Lamme Street
Bozeman, Montana 59717
(406) 582-2400
(Library hours vary.)

VI. AFFIRMATION OF STATUTORY REQUIREMENTS

Considering the new situation with respect to the closure of the pole plant and the changes that have been made to the selected remedy, EPA, in consultation with MDEQ, believes that the remedy remains protective of human health and the environment, complies with Federal and State requirements that are both applicable or relevant and appropriate to this remedial action or involves appropriate waivers of these requirements, and is cost-effective. In addition, the revised remedy utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable for the Site.

VII. APPROVAL

Mark A. Simonich, Director
Montana Department of Environmental Quality

11/17/98
Date

Max H. Dodson, ARA
Office of Ecosystems Protection and Remediation
U.S. Environmental Protection Agency

11.27.98
Date